



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

July 13, 2016

IN REPLY PLEASE

REFER TO FILE:

WM-0

A4174-5

TO: Each Supervisor

FROM: Gail Farber *Gail Farber*
Director of Public Works

UNINCORPORATED COUNTY OF LOS ANGELES SEMI-ANNUAL STORMWATER COMPLIANCE REPORT – JULY 2016

In accordance with the Board's request at the March 12, 2013, Public Hearing, this report summarizes the County's implementation of the Los Angeles County Municipal Separate Storm Sewer System National Pollutant Discharge Elimination System Permit (MS4 Permit) issued by the Los Angeles Regional Water Quality Control Board (Regional Board). The MS4 Permit became effective on December 28, 2012, and was issued to 86 permittees including the County of Los Angeles, the Los Angeles County Flood Control District (LACFCD), and 84 cities (excluding the Cities of Avalon, Lancaster, Long Beach, and Palmdale). This report covers the period from January to June 2016 and is organized into four parts:

1. Permit compliance in the unincorporated County areas;
2. Upcoming major compliance milestones;
3. Budget and funding; and
4. Regulatory and legal matters.

Stormwater Compliance in Unincorporated County Areas

In 2006, the Chief Executive Office established the Unincorporated Area Stormwater Program to address increasing challenges facing the County in the area of stormwater and urban runoff pollution. The purpose of the Program is to plan and implement control measures in unincorporated areas and at various County facilities to improve water quality and comply with Federal and State clean water regulations. While each department is responsible for implementing control measures to abate pollution from its own facilities and operations, the responsibility of the overall Program coordination was delegated to the Department of Public Works.

I. PERMIT COMPLIANCE IN THE UNINCORPORATED COUNTY AREAS

A. Status of Collaborative Watershed Management Programs

Nineteen collaborative watershed groups have been formed to implement the permit requirements throughout the Los Angeles County Region (Attachment A). The County is a party to 12 of the 19 watershed groups. Of the 12 watershed groups, one is pursuing the Watershed Management Program (WMP) compliance alternative and the remaining 11 are pursuing the Enhanced Watershed Management Program (EWMP) compliance alternative. All WMP and EWMP plans were approved by the Regional Board in spring 2015 and spring 2016, respectively. As of April 2016, the County's efforts have transitioned from the planning phase (development of plans) to the implementation phase (implementation of the plans). The implementation phase involves further development of regional, multi-benefit, stormwater capture projects identified in the WMP/EWP plans. Activities during the implementation phase include, but are not limited to, development of project concepts, initiation of technical studies and investigations, preparation of design plans, acquisition of environmental documents and permits, coordination with project partners and cities, pursuit of funding and grants, and project construction.

Compliance with the MS4 Permit is determined in part by the timely submittal of the WMP/EWMP plans and their full implementation. The County will be reporting its MS4 Permit-related efforts for the Fiscal Year 2015-16 to the Regional Board by December 15, 2016. Similar to the development and submittal of the WMP/EWMP Plans, the County intends to submit annual reports to the Regional Board as a party to the 12 watershed groups it is participating in.

B. Status of Collaborative Monitoring Programs

Each of the 19 watershed groups developed a corresponding Coordinated Integrated Monitoring Program (CIMP) plan. The County is a party to 12 of the CIMP plans, which were approved by the Regional Board in late 2015 and early 2016. The CIMP plans are in various stages of implementation in accordance with the timeline prescribed in the MS4 Permit. As a result of approval of the CIMP plans, water quality monitoring has significantly increased. The number of monitoring locations Countywide increased from 180 to 360 (of which 275 locations are within the 12 CIMP watershed groups that the County is participating in). The frequency of sampling at the monitoring locations and the number of constituents analyzed also increased.

C. Status of Current Priority Projects

The County's primary focus is towards the implementation of regional, multi-benefit, stormwater capture projects that were prioritized in accordance with the Total Maximum Daily Load (TMDL) compliance timelines in their respective watersheds. The County and other permittees in the watershed groups have identified early-priority projects for implementation throughout the region [Attachment B]. Full compliance with the MS4 Permit will require identification and implementation of additional projects, in order to meet the necessary volumes of captured stormwater as stated in the WMP/EWMP plans. Below are the County-led, early-priority projects that are currently being implemented.

Regional, Multi-Benefit, Stormwater Capture Projects

- i. **Roosevelt Park Stormwater Capture Project (SD2):** A project concept report in coordination with the Department of Parks and Recreation (DPR) is currently being developed to capture, treat, and infiltrate stormwater at Roosevelt Park located in Florence/Firestone. This Project is included in the Upper Los Angeles River's EWMP plan and will capture runoff from 203 acres of unincorporated County area. This Project has been awarded a grant of \$2.05 million from the Proposition 84 Integrated Regional Water Management Grant Program and is on schedule to begin construction in late 2017 pending Board approval.
- ii. **East Los Angeles Sustainable Median Stormwater Capture Project (SD1):** A project concept report is currently being developed in coordination with Landscape Maintenance District (LMD) Zone 35 to capture, treat, and infiltrate stormwater within large medians located in the LMD service area. The Project is included in the Upper Los Angeles River's EWMP plan and will capture runoff from approximately 500 acres of unincorporated County area.
- iii. **Ladera Park Stormwater Capture Project (SD2):** A project concept report is currently being developed in coordination with DPR to capture, treat, and infiltrate stormwater at Ladera Park located in Ladera Heights. This Project is included in the Ballona Creek EWMP plan and will capture runoff from 110 acres of unincorporated County area. This Project is scheduled to begin construction in late 2018 pending Board approval.
- iv. **Gates Canyon Park (SD3):** A project concept report is currently being developed in coordination with the City of Calabasas to capture and reuse

stormwater for park irrigation. This Project, located in the City of Calabasas, is included in the Malibu Creek EWMP Plan and will capture runoff from 105 acres of unincorporated County area. This Project is scheduled to begin construction in mid-2017 pending Board approval.

- v. **Viewridge Super Green Streets Project (SD3):** A project concept report is currently being developed to capture and treat stormwater through a super green streets project. This Project, located in the Summit Pointe Community, is included in the North Santa Monica Bay Coastal Watersheds EWMP Plan and will capture runoff from 81 acres of unincorporated County area. This Project is scheduled to begin construction in mid-2017 pending Board approval.

The County continues to collaborate and seek partnerships with other cities in implementing priority projects.

Green Streets

In addition to regional, multi-benefit, stormwater capture projects, the County has begun incorporating green street features into County road projects, which will help retain and treat stormwater runoff along roadway corridors. As part of this effort, Public Works recently convened a panel of experts to guide the identification, prioritization, design, maintenance, tracking, and effectiveness assessment of green street projects and support the County's MS4 compliance efforts.

D. Status of Minimum Control Measures (MCM) Program

The County, in collaboration with Public Works and other County departments, continues to manage and implement MCM Programs as required by the MS4 Permit. There are currently six MCM Programs: Public Information and Participation Program, Industrial/Commercial Facilities Program, Planning and Land Development Program, Development Construction Program, Public Agency Activities Program, and Illicit Connections and Illicit Discharges Elimination Program. Below are key developments on two of the MCM Programs:

- **Public Agency Activities Program - Integrated Pest Management Program:** The County of Los Angeles' Integrated Pest Management (IPM) Program was finalized in 2015. The IPM Program (www.LACountyIPM.org) encapsulates a more environmentally sensitive and sustainable approach to

pest management at County facilities and operations. The next phase of the IPM Program is the formation of the IPM Alliance, comprised of County department representatives, which would allow the sharing of experiences, successes, and areas for improvement. The IPM Alliance will meet twice a year.

- **Public Information and Participation Program - School Outreach Program:** Two Programs, Environmental Defenders and Generation Earth, are offered to schools throughout the County to educate K-12 students on stormwater pollution prevention. A new interactive Environmental Defenders children's website (www.environmentaldefendersLA.com) was created and launched in April 2016.
- **Public Information and Participation Program - CleanLA Hotline:** The 888-CLEAN-LA hotline for dissemination of information pertaining to various environmental programs including stormwater pollution prevention and household hazardous waste, and for public reporting of illicit discharges and illegal dumping was enhanced in March 2016 to improve the caller experience by providing easier navigation through the call-in system.

II. UPCOMING MAJOR COMPLIANCE MILESTONES

A. Compliance Milestones 2-Year Look Ahead

The following table lists major compliance milestones applicable to the County within the next two years. The County continues to plan and take necessary actions towards meeting these and future milestones, which will require additional resources and funding.

Compliance Date	Requirement
September 2016	Final compliance for LA River Trash TMDL. Regional Board adoption of the Santa Clara River Lakes Nutrients TMDL.
December 2016	Annual Report due to the Regional Board.
April 2017	Comprehensive evaluation of WMP (Adaptive Management).

Compliance Date	Requirement
July 2017	Report of Waste Discharge (ROWD) due to Regional Board. ROWD serves as the application for the next MS4 Permit.
July 2017	Final compliance for Malibu Creek Trash TMDL.
December 2017	Annual Report due to the Regional Board.
December 2017	Final compliance for Malibu Creek Nutrients TMDL.
December 2017	Expiration of the current MS4 Permit. Regional Board adoption of the new MS4 Permit to follow.
March 2018	Final compliance for Marina del Rey Toxics TMDL (back basins).
April 2018	Comprehensive evaluation of EWMPs (Adaptive Management).

III. BUDGET AND FUNDING

A. Fiscal Year 2016-17 Budget

The following table shows the requested and approved Net County Cost Budget for the Unincorporated Area Stormwater Program for Fiscal Year 2016-17, as of June 30, 2016. The County is seeking to receive the balance of \$26,573,000 during the September Supplemental changes, as part of the budget process.

Category	Requested Budget Fiscal Year 2016-17	Approved Budget as of June 30, 2016 Fiscal Year 2016-17
Ongoing Base Allocation*	\$10,176,000	\$10,412,000**
Additional Program Budget*	\$17,804,000	\$7,425,000
Capital Projects	\$16,430,000	\$0
Total	\$44,410,000	\$17,837,000

* Includes coordination and oversight, planning and reporting, operation and maintenance of new water quality infrastructure, water quality monitoring, and implementation of programmatic controls such as public education and enhanced street sweeping.

**\$10,412,000 includes \$236,000 for COLA increases.

B. Four-Year Budget Forecast

The following table shows the current Unincorporated Area Stormwater Program's 4-year budget forecast. The forecast is expected to be refined as more information becomes available, including new MS4 Permit requirements after December 2017.

Category	Fiscal Year 2017-18	Fiscal Year 2018-19	Fiscal Year 2019-20	Fiscal Year 2020-21
Program Cost*	\$38,000,000	\$38,500,000	\$38,500,000	\$38,500,000
Capital Projects	\$15,000,000	\$15,000,000	\$15,000,000	\$15,000,000
Total	\$53,000,000	\$53,500,000	\$53,500,000	\$53,500,000

* See footnote to the previous table.

C. Grants and Long-Term Funding Strategy

The County continues to pursue funding for the implementation of regional, multi-benefit, stormwater capture projects including the State's Propositions 1 and 84 grant Programs. State and Federal programs geared towards stormwater capture and water quality improvements are very limited and attract a lot of applicants, making it very competitive to receive grant funds. To date, the County has submitted a total of 15 grant applications and has received one award for an amount of \$2,050,000 and six notifications of "non-award." The County expects to hear back from the granting agencies on the status of the remaining eight applications later this year.

The County continues to identify and explore other funding opportunities, including planning ahead for future grant program rounds, and developing partnerships with cities, agencies, and organizations.

D. Staffing Needs

All 26 full-time positions budgeted for the Unincorporated Area Stormwater Program have been filled.

IV. REGULATORY AND LEGAL MATTERS

A. Recent Regulatory Actions

The following are recent regulatory actions that may have potential impact on the County.

- On June 21, 2016, the Regional Board released a new Nutrients TMDL for the Santa Clara River Lakes (Lake Elizabeth, Munz Lake, and Lake Hughes). The TMDL impacts County residents, facilities, and operations in the area, including local septic systems, the Lake Hughes Community Wastewater Treatment Facility, and stormwater runoff. The Regional Board is scheduled to adopt the TMDL on September 8, 2016. Public Works and the Department of Public Health, in coordination with County Counsel and the Chief Executive Office, are reviewing the proposed TMDL.

B. Enforcement

During this reporting period, the Regional Board did not take any enforcement actions related to the current MS4 Permit.


C. Recent Legal Matters

- Shortly after the issuance of the MS4 Permit in December 2012, 37 interested parties, including municipalities and environmental groups, petitioned the State Water Board to review aspects of the MS4 Permit. Central to these petitions was the legality of the MS4 Permit's WMP and EWMP compliance mechanisms. On June 16, 2015, the State Water Board adopted an order that generally upheld the MS4 Permit. In July 2015, three separate legal challenges, by the Natural Resources Defense Council (NRDC), the Los Angeles Waterkeeper, City of Gardena, and Cities of Duarte and Huntington Park were filed in the Los Angeles Superior Court against the State Water Board and the Regional Board. On December 17, 2015, the Superior Court denied merging the cases and allowed the city cases to be transferred to Orange County. Earlier this year, the City of Huntington Park withdrew their challenge. The NRDC legal challenge is scheduled to be heard on September 30, 2016, at the Los Angeles Superior Court. The cities legal challenge hearing has not been scheduled.
- On May 19, 2016, the Los Angeles Waterkeeper and the NRDC filed a petition to the Regional Board and State Water Board challenging the Regional Board Executive Officer's approval of the North Santa Monica Bay EWMP plan. The petition alleges that the North Santa Monica Bay EWMP plan fails to comply with the provisions of Areas of Special Biological Significance along the Malibu coast. The North Santa Monica Bay EMWP group consists of the City of Malibu, County, and LACFCD.

PA:sw

P:\wmpub\Secretarial\2016 Documents\A-memos\4174\UA Stormwater Rpt Jul 2016.doc\C16150

Attach.

 cc: Chief Executive Office (Anthony Baker, Rochelle Goff, Jim Jones)
Executive Office
County Counsel (Judith Fries)

EWMP and WMP Groups (As Of 06/30/16)

WMP Groups:

- 3 - LA River Upper Reach 2
- 4 - Lower LA River
- 7 - East San Gabriel River
- 8 - Lower San Gabriel River
- 9 - Los Cerritos Channel
- 18 - Alamitos Bay
- 19 - Santa Monica Bay Jurisdiction 7

 National Forest Area

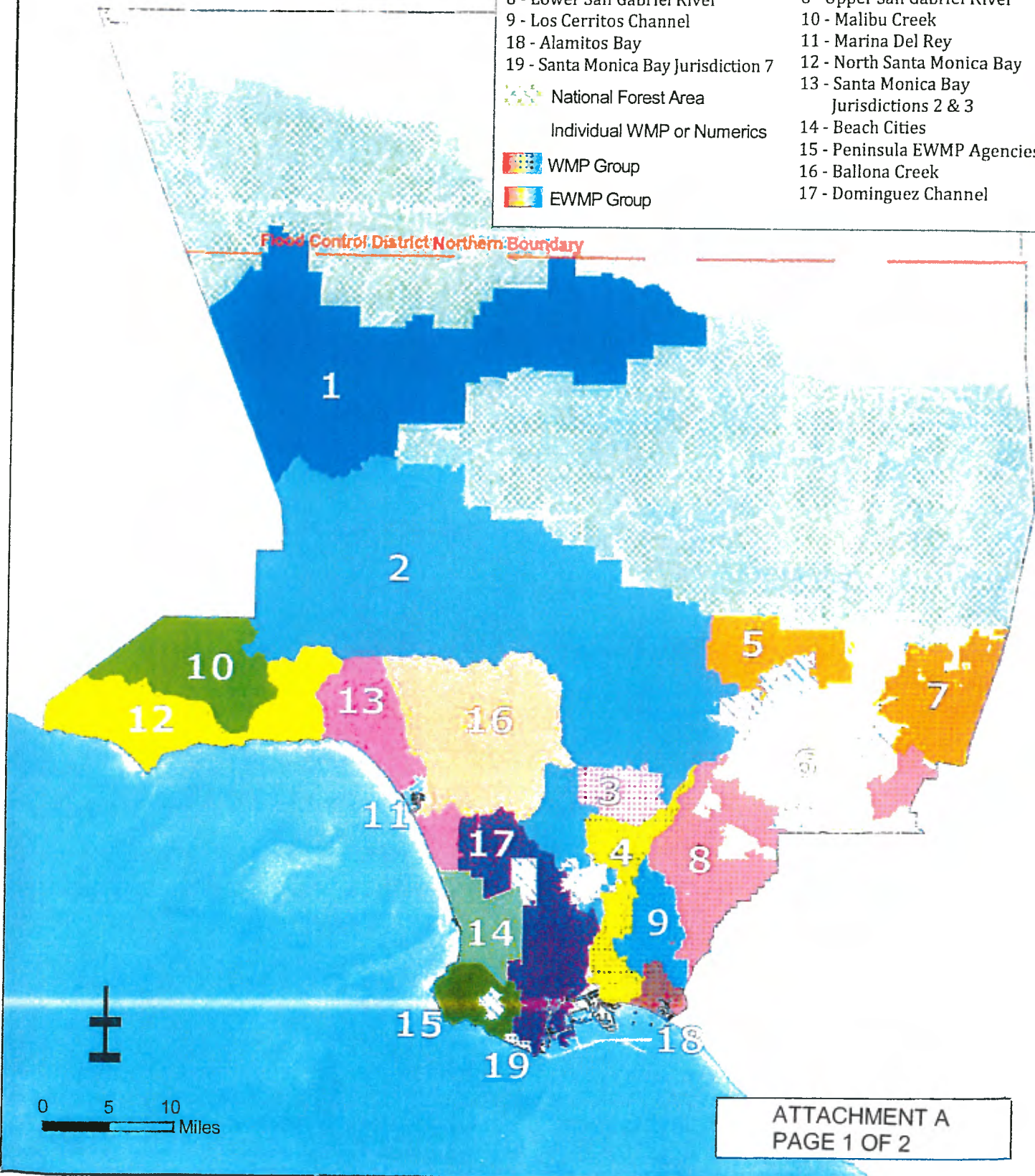
Individual WMP or Numerics

 WMP Group

 EWMP Group

EWMP Groups:

- 1 - Upper Santa Clara River
- 2 - Upper Los Angeles River
- 5 - Rio Hondo/San Gabriel River
- 6 - Upper San Gabriel River
- 10 - Malibu Creek
- 11 - Marina Del Rey
- 12 - North Santa Monica Bay
- 13 - Santa Monica Bay Jurisdictions 2 & 3
- 14 - Beach Cities
- 15 - Peninsula EWMP Agencies
- 16 - Ballona Creek
- 17 - Dominguez Channel



WMP/EWMP GROUPS and INDIVIDUAL
CITIES Status as of 6/30/16

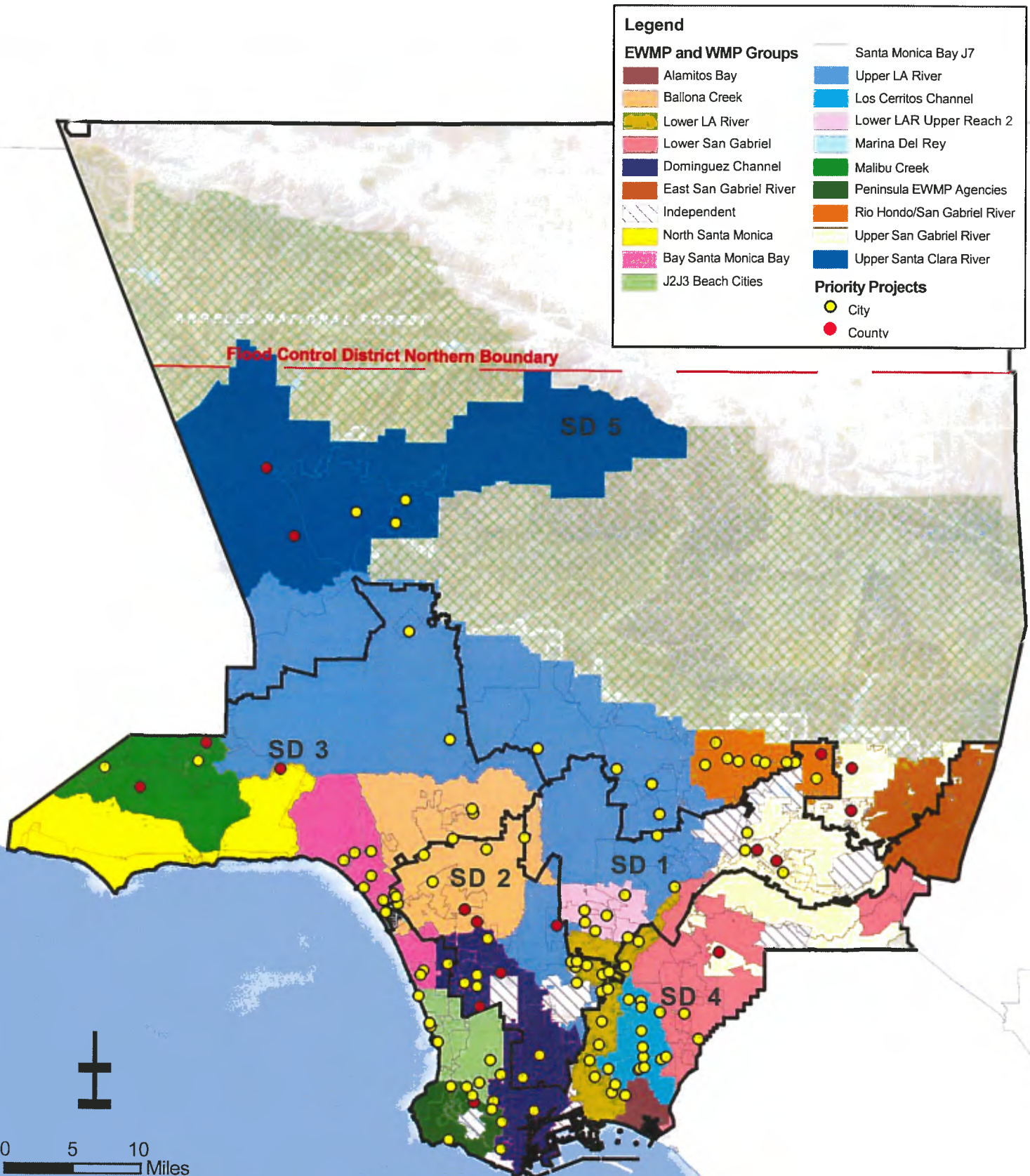
Bold = Lead/Coordinator

	Group Name	Cities/Permittees Involved	Plan	SD
1	Upper Santa Clara River Watershed	Santa Clarita , County, LACFCD	EWMP	5
2	Upper Los Angeles River Watershed Group	Alhambra, Burbank, Calabasas, Glendale, Hidden Hills, La Canada Flintridge, Los Angeles , Montebello, Monterey Park, Pasadena, Rosemead, San Fernando, San Gabriel, San Marino, South El Monte, South Pasadena, Temple City, County, LACFCD	EWMP	1,2,3,5
3	Los Angeles River Upper Reach 2 Sub Watershed	Bell, Bell Gardens, Commerce, Cudahy, Maywood, Huntington Park , Vernon, LACFCD	WMP	1
4	Lower Los Angeles River Watershed Group	Downey, Lakewood, Long Beach, Lynwood, Paramount, Pico Rivera, Signal Hill , South Gate, LACFCD	WMP	1,2,4
5	Rio Hondo/San Gabriel River Water Quality Group	Arcadia, Azusa, Bradbury, Duarte, Monrovia, Sierra Madre , County, LACFCD	EWMP	1,5
6	Upper San Gabriel River EWMP Group	Baldwin Park, Covina, Glendora, Industry, La Puente, West Covina, County , LACFCD	EWMP	1,4,5
7	East San Gabriel Valley Watershed Management Group	Claremont , La Verne, Pomona, San Dimas	WMP	1,5
8	Lower San Gabriel River Watershed Management Group	Artesia, Bellflower, Cerritos, Diamond Bar, Downey, Hawaiian Gardens, La Mirada, Lakewood, Long Beach, Norwalk , Pico Rivera, Santa Fe Springs, Whittier, LACFCD	WMP	1,4
9	Los Cerritos Channel Watershed Group	Bellflower, Cerritos, Downey, Lakewood, Long Beach , Paramount, Signal Hill, LACFCD	WMP	4
10	Malibu Creek Watershed Group	Agoura Hills, Calabasas , Hidden Hills, Westlake Village, County, LACFCD	EWMP	3
11	Marina del Rey	Culver City, Los Angeles, County , LACFCD	EWMP	2,3,4
12	North Santa Monica Bay Coastal Watersheds	Malibu , County, LACFCD	EWMP	3
13	Santa Monica Bay Jurisdictions 2 & 3	El Segundo, Los Angeles , Santa Monica, County, LACFCD	EWMP	2,3,4
14	Beach Cities Watershed Management Group	Hermosa Beach, Manhattan Beach, Redondo Beach , Torrance, LACFCD	EWMP	4
15	Peninsula EWMP Agencies	Palos Verdes Estates, Rancho Palos Verdes , Rolling Hills Estates, County, LACFCD	EWMP	4
16	Ballona Creek	Beverly Hills, Culver City, Inglewood, Los Angeles , Santa Monica, West Hollywood, County, LACFCD	EWMP	1,2,3,4
17	Dominguez Channel Watershed Management Area Group	Carson, El Segundo, Hawthorne, Inglewood, Lawndale, Lomita, Los Angeles , County, LACFCD	EWMP	2,4
18	Alamitos Bay/Los Cerritos Channel Group	County, LACFCD	WMP	4
19	Santa Monica Bay Jurisdiction 7	Los Angeles, LACFCD	WMP	4

	City	Watershed Management Area	Compliance Method	SD
a	Compton	LA River (Compton Creek) & Dominguez Channel	Deficient WMP	2
b	El Monte	LA River and San Gabriel River	Individual WMP	1
c	Gardena	Dominguez Channel WMA	Deficient WMP	2
d	Irwindale	LA River and San Gabriel River	Deficient WMP	1
e	La Habra Heights	San Gabriel River	Individual WMP	4
f	Rolling Hills	Dominguez Channel WMA (Machado Lake, LA Harbors) & J7	Numerics	4
g	Walnut	San Gabriel River	Individual WMP	1
h	Long Beach	Dominguez Channel WMA, San Pedro Bay nearshore watershed	Individual WMP	4

 National Forest Area

Priority Projects in EWMP/WMP Groups (As Of 06/30/15)



ATTACHMENT B